

1       1       Teresa M. Corbin (SBN 132360)  
2       2       Denise M. De Mory (SBN 168076)  
3       3       Jaclyn C. Fink (SBN 217913)  
4       4       HOWREY LLP  
5       5       525 Market Street, Suite 3600  
6       6       San Francisco, California 94105  
7       7       Telephone: (415) 848-4900  
8       8       Facsimile: (415) 848-4999  
9  
5       5       Attorneys for Plaintiff SYNOPSYS, INC.  
6       6       and for Defendants AEROFLEX INCORPORATED,  
7       7       AEROFLEX COLORADO SPRINGS, INC., AMI  
8       8       SEMICONDUCTOR, INC., MATROX  
9       9       ELECTRONIC SYSTEMS, LTD.,  
10      10      MATROX GRAPHICS, INC.,  
11      11      MATROX INTERNATIONAL CORP.,  
12      12      and MATROX TECH, INC.

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

13 | RICOH COMPANY, LTD.,

Case No. C03-04669 MJJ (EMC)  
C03-02289 MJJ (EMC)

14 Plaintiff,

15 || VS

16 | AEROFLEX INCORPORATED, et al..

**DECLARATION IN SUPPORT OF  
MISCELLANEOUS ADMINISTRATIVE  
REQUEST TO FILE CERTAIN  
DOCUMENTS AND EXHIBITS UNDER  
SEAL**

17 | Defendants

---

SYNOPSYS, INC.

**Plaintiff,**

vs.

RICOH COMPANY, LTD.

Defendant

24 || J. DENISE M. DE MORY declare as follows:

25 I am an attorney at law, admitted to practice law in the State of California, and am a partner in  
26 the law firm of Howrey LLP. I am counsel for Synopsys, Inc. and Aeroflex, et al. I have personal  
27 knowledge of the facts contained in this declaration, and if called upon to do so, I could and would  
28 testify competently thereto.

1       1. A Miscellaneous Administrative Request to File Certain Documents and Exhibits Under  
 2 Seal ("Request") was filed February 9, 2006 pursuant to Civil Local Rule 7-11.

3       2. The Request sought permission to file under seal a Joint Letter to Magistrate Judge  
 4 Edward M. Chen, dated February 6, 2006, and some of its accompanying exhibits.

5       3. A Stipulated Protective Order ("Order") was entered on June 3, 2003 between the  
 6 Parties.

7       4. The following 14 documents are designated confidential as defined in the Order.

- 8       a) Tiedeman Deposition Exhibit #107 (Exhibit 6 to the Joint Letter).
- 9       b) O'Brien Deposition Exhibit #122 (Exhibit 7 to the Joint Letter).
- 10       c) Dwyer Deposition Exhibit #29 (Exhibit 8 to the Joint Letter).
- 11       d) Tiedeman Deposition Exhibit #108 (Exhibit 9 to the Joint Letter).
- 12       e) O'Brien Deposition Exhibit #126 (Exhibit 10 to the Joint Letter).
- 13       f) Dorio Deposition Exhibit #245 (Exhibit 11 to the Joint Letter).
- 14       g) Tiedeman Deposition Exhibit #127 (Exhibit 12 to the Joint Letter).
- 15       h) O'Brien Deposition Exhibit #109 (Exhibit 13 to the Joint Letter).
- 16       i) Tiedeman Deposition Exhibit #110 (Exhibit 14 to the Joint Letter).
- 17       j) Dorio Deposition Exhibit #246 (Exhibit 15 to the Joint Letter).
- 18       k) Dorio Deposition Exhibit #247 (Exhibit 16 to the Joint Letter).
- 19       l) Tiedeman Deposition Transcript (Exhibit 17 to the Joint Letter).
- 20       m) O'Brien Deposition Transcript (Exhibit 18 to the Joint Letter).
- 21       n) Dorio Deposition Transcript (Exhibit 19 to the Joint Letter).

22       5. The above 14 documents should be filed under seal pursuant to the Order.

23 Dated: February 17, 2006

HOWREY LLP

25       By: /s/Denise M. De Mory  
 26                   Denise De Mory  
 27                   Attorneys for Plaintiff  
 28                   Synopsys, Inc.